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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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| <p>Carlos Flores-Ortiz,</p> <p>Plaintiff,</p> <p>v.</p> <p>Bayview Financial, LP, <i>et al</i>,</p> <p>Defendants.</p> | <p>Case No: 2:15-cv-00939-RFB-GWF</p> <p>STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request]</p> |
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STIPULATION AND PROPOSED ORDER

Plaintiff Carlos Flores-Ortiz (“Plaintiff”), Defendant Bank of America, N.A. (“BANA”) (jointly as the “Parties”), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to BANA’s motion to dismiss [ECF No. 16].

WHEREAS, on May 19, 2015, Plaintiff filed in this Court a Complaint for Damages, ECF No. 1;

WHEREAS, on December 1, 2015, BANA filed its Motion to Dismiss the Complaint, ECF No. 16;

WHEREAS, a Response to BANA’s Motion to Dismiss is due on December 18, 2015, ECF No. 16;

WHEREAS, the Parties are discussing the possible early resolution in this case and it is likely that the Parties will reach a settlement within 30 days.

WHEREAS, this is the first request for an extension of this deadline by the Parties.

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and BANA as follows:

- (1) Plaintiff shall have until January 17, 2015 to respond to BANA’s Motion to Dismiss [ECF No. 16].

IT IS SO STIPULATED.

DATED this 18th day of December 2015.

[continued on next page]

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IT IS SO ORDERED



UNITED STATES DISTRICT JUDGE

DATED: December 28, 2015

CERTIFICATION OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on December 18, 2015, the foregoing STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request] was served via CM/ECF to all parties appearing in this case.

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By: /s/ Michael Kind
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